

### State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT CN 028 Trenton, N.J. 08625-0028

(609) 633-1408 Fax # (609) 633-1454

Laura J. Livingston, Chief USEPA, Region II 26 Federal Plaza New York, New York 10278

Feb. 20, 1992

Dear Ms. Livingston:

Enclosed is a copy of a letter from Monocrete Container & Drum Co requesting the following information changes(s):

- 1. Company Name
- 2. Corporate Name/Ownership
- 3. Company Contact
- 4. EPA ID Number
- Notification Status to: 5. TSD

Transporter Generator Non-Handler S.Q. Generator

- Generator/Company Closure
  DELIST EPA ID. NO NJD069303790 6. AS PER NJDEP
- Other INSPECTION REPORT RECOMMENDATIONS (SEE ATTACHED) 7.

Please make the indicated changes to your RCRA mailing address file. Your attention in this matter would be greatly appreciated.

Bureau of Manifest & Information Systems

CB: dag Enclosure

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### MEMO

### NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

то	Philip Cole, Section Chief, BAM	January 30, 1992
FROM _	Jeffrey Sterling, Acting Section Chief,	MFO-RCRA
SUBJECT	Status of NJD 000694232 & NJD 069303790	

A recent RCRA inspection at Tunnel Barrel & Drum Co., Inc. (NJD001601152) revealed that Monocrete Container & Drum Co. (NJD069303790) and Gluck Barrel & Fiber Drum Co. (NJD000694232) are no longer in business. Tunnel Barrel & Drum purchased the business accounts of these companies years ago.

Since the above referenced companies no longer exist the subject EPA ID numbers, NJD000694232 and NJD069303790, should be deactivated.

If you have any questions about this memo please call John Dotterweich of my staff at (201)669-3913.

E42:G27

c: File John Dotterweich

# TUNNEL BARREL & DRUM CO., INC.

DEALERS IN NEW & USED

# BARRELS AND DRUMS 85 TRIANGLE BOULEVARD

CARLSTADT, N. J. 07072

January 27, 1983

Mr. Alphonse Iannuzzi Jr. 1259 Route 46 Parsippany, N.J. 07054

Dear Sir:

After meeting with you yesterday and having had our plant and records inspected by you, I would like the analogue of the inspection.

To start, two years ag when you first image on plants on plants one problem which you discovered us spill of summons. The spill was located on the ground in an area behind our building, which was approximately 3' x 10' and about ½" deep into the soil. Upon your recommendation is also had up the contaminated soil and put it is 30 cellon steel area macadamized so that in the event of another spill the liquid or solid could be absorbed by speedi-dry, sawdust etc.

we then contacted Man contaminated soil (wnren you india-considere end we were accured that he had the proper possible and authorization to nanone 10. We had known Mr. Barone for a number of years because he was, we thought, primarily in the barrel and drum business and we did in fact buy empty fibre drums from him from time to time. Also, because we had our own truck maintenance shop we did some repair work for him when he first started on his own in the drum business. facts bring us to the point where one or men wone and we agree. Description of the He then promised as that all the paper work would be sent in the men and pagable and as you know this never don. Not too soon after that he made quite a splash in the Bergen Record newspaper and we haven't heard from him since.

Because of the small quantity of hazardous material and the fact that I thought the problem was taken care of, I completely forgot about the entire situation until you showed up for your inspection. Be assured that if I has realized the problem, I would have done everything in

my power to rectify the situation and also, we did not in any way mishandle or ship a hazardous waste other than failing to get the paper work from Mr. Barone.

I will though, continue to try and contact Mr. Barone in order to secure the paper work needed to rectify our problem. If there is any other guidance or help you can offer me with regard to this situation, please do not hesitate to call.

Finally, as we discussed, o

Thank you again for your help and consideration during your inspection.

Sincerely,

TUNNEL BARREL & DRUM CO., INC.

Joseph Binder Jr

JB/cy

Gluck - 000 694232 - Transy.

Monocrete - 069303790 - "

Tunnel famel - 00/601/52 - "

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

8	EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY	INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the
	INSTALLA- TION'S EPA I.D. NO.		information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is
I.	NAME OF IN-		complete and correct, leave Items I, II, and III below blank, If you did not receive a preprinted
	INSTALLA-		label, complete all items, "Installation" means a single site where hazardous waste is generated,
II.	TION MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE	treated, stored and/or disposed of, or a trans- porter's principal place of business. Please refer
III	LOCATION OF INSTAL- LATION		to the INSTRUCTIONS FOR FILING NOTIFI- CATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).
FC	R OFFICIAL U	大学的大学,我们就是一个大学的大学的大学的大学的大学的大学的大学的大学的大学的大学的大学的大学的大学的大	
<u> </u>		COMMENTS	
C 15	16		55
s	INSTALLATIO	ON'S EPA I.D. NUMBER APPROVED DATE RECEIVED (yr., mo., & day)	
F	M/D061	930379021	第四章 15 min (1987年) 1987年 - 19
I.	NAME OF INST	FALLATION	HAN STREET, ST
M 30	on ocr	ete Container and Drum I	n c 67
	INSTALLATIO	ON MAILING ADDRESS	
<u>c</u> 3	ole Im	STREET OR P.O. BOX	
15		iangle Blvd	45
<u> </u>			PCODE
15	16	- 40 41 42 47	100712!
III	LOCATION O	F INSTALLATION STREET OR ROUTE NUMBER	
		i a n g l e B l v d	45
15		CITY OR TOWN ST. ZII	CODE
			0 7 2
IV	. INSTALLATI	ON CONTACT 40 A1 42 47	- 51
С		NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2		r Joseph Sec Treas	2 0 1 - 9 3 3 - 1 4 4 4 4
V.	OWNERSHIP	A. NAME OF INSTALLATION'S LEGAL OWNER	
<u>c</u> 8	Monoc	rete Container and Drum	Inc
15 (e)	B. TYPE OF Cotter the appropria	wnership te letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (e	nter "X" in the appropriate box(es))
	F = FEDERAL	X a. generation X B.	TRANSPORTATION (complete item VII)
	M = NON-FED	ERAL X C. TREAT/STORE/DISPOSE 0.00 D.	UNDERGROUND INJECTION
VI	I. MODE OF TI	RANSPORTATION (transporters only – enter "X" in the appropriate	box(es))
	A. AIR	B. RAIL XC. HIGHWAY D. WATER SE. OTHE	R (specify):
		UBSEQUENT NOTIFICATION	
		ropriate box to indicate whether this is your installation's first notification of ha it notification, enter your Installation's EPA I.D. Number in the space provided by	
	A. FIRST	NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete ite	C. INSTALLATION'S EPA I.D. NO.
IX	. DESCRIPTION	N OF HAZARDOUS WASTES	
		se of this form and provide the requested information.	

EPA Form 8700-12 (6-80)

CONTINUE ON REVERSE

Esigh B	af		Joseph Binder		8/15/80
ieve that the submit	t that basea on my ted information is t	inquiry of those indiring the control of the control of the and imp	ividuals immediately	responsible for obta that there are signifi	ining the information
RTIFICATION tify under penalty	of law that I have r	personally examined	and am familiar with	the information and	hmittad in this and
(D001)	E (00)	2. CORROSIVE 02)	∐3. REAC (D003)		K 4. TOXIC (D000)
ardous wastes your inst	allation nancies. (See 4	10 CFR Parts 261.21 — 2	261.24.)		
ARACTERISTICS OF	NON-LISTED HAZAR	23 - 26 RDOUS WASTES. Mark	"X" in the boxes corre	ponding to the character	23 - 26
49	50	51	52	53	54
pitals, medical and rese	arch laboratories your i	digit number from 40 (nstallation handles. Use	CFR Part 261,34 for eac	h listed hazardous waste essary.	e from hospitals, veterin
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	- 44	45	46	47	48
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U 2 2 0			34	35	36
ce your installation ha	ndles which may be a h	azardous waste. Use ad	ditional sheets if necessa	ry.	
MMERCIAL CHEMICA	23 - 26 AL PRODUCT HAZAR	DOUS WASTES. Enter	the four—digit number	23 - 26 from 40 CFR Part 261.1	33 for each chemical su
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20 26	23 - 26	23 - 26	23 - 26	23 - 26
23 - 26					
13	your installation handle	15	if necessary.	17	18
ZARDOUS WASTES I	FROM SPECIFIC SOUP	RCES. Enter the four—ces. Use additional sheets	ligit number from 40 CF	R Part 261.32 for each	listed hazardous waste
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
F 0 1 17	2	3	4	5	6

ELLIOT 1. SHATIRO, P.E., CHARLES M. SHAPIRO & SONS, P.C., CONSULTING ENGINEERS, 615 COURT STREET, BROOKLYN, NEW YORK 11231 212 596-1902

### RCRA INSPECTION FORM

	PA3
Report Prepared for:	FEB 23 12 15 PH '83
Generator 🔟	ENVIRORS AGENCY NEW YORK, N.Y. 1999Y
Transporter [7]	
HWM (TSD) facility	
Copy of report sent to the facility /	
	Facility Information
Name:	Monocrete Container Co., The
	85 Triangle Blud.
	Carlstadt, NJ. 07072
EPA ID#:	NJ 0069303790
Date of Inspection:	
	Participating Personnel
State or EPA Personnel:	Al Jannuzzi Jr.
Facility Personnel:	Joseph Binder, sec-Treware
	Joseph Binder, sec-Treasurer
Report Prepared by Name:	Alphonse Fannazzi Tr.
	NJ-DEP
	201-648-3669
Approved for the Director by:	

### Summary of Findings

### Facility Description and Operations

Glack Barrel & Drum Co. (NJD0006694232), Tunnel Barrel ? Drum Co. Inc. (NJD001601152), and Monocrete Container Co., Inc. (NJ0069303790) one all the same company operating out of one building on 85 Triangle Blud Carlstadt, NJ. All three registered as a Gen, Trans, & TSDF. The reason for having all three co's listed at the same address is due to Tunnel buying out Glack and monounte . Since Tunnel didn't want to loose any of the other two company's customers they kept their name. Since they maintain Gluck and monacreto names they also registered all three company's for hazardow work activity. This company is a drum recorditioner of fiber pack drams. Used fiber pack drums are bought from customers, weaked, wifed, or steamed out ( work water is discharged to Bergen County Utilities Authority Little Ferry, NJ. sewage treatment plant), painted, and sold to customers as reconditioned drams. Empty metal and plastic drung are received, catagorized according to size and type, and sold to drum reconditioners. No cleaning of thes drums occur on site. Metal prums one sold to AcmE Albert 10,00 Grand Ave. Brooklyn, My, & Jacob Kline Cooperage Allentown, PA., and Central steel Drum Newart, NJ. Plastic drums are sild

contained hazardous woode, other drums on noted on site had busics. We and flammable labeleson them

Tunnel registered on a Gen, Trans, TSPF, due to recommendations

Signature of Facility Representative

HW/EF No.

Comments, observations, summary

After they realized that the regulations (RCRU) their laryer. did not include empty drums they had already registered with Attacked is a letter from Mr. Binder representing all three Washington, D.C. 1 accompanying an Status sheet for non-regulated Generators A facility form (for tunnel). all three company's would like to remove their General TSPF status and teep their trans. Three 30 gol. drums of caustic spill cleanup material were a councilated in 3/81, This spill was notel KIRA inspection of Tunnel by Tunnel does not have manifest stated that Barane Barrel : Drum these drums sometime in 4/21. Without a manifest truck refair out fit operating out of the Trucking. Barone had brought one of its trucks in for and Tunnel had detected the price for disposing of these drums bill / Gee attacked repair bill dated Mr. Urciali stated that Barene never left a munifest he did not have a form on his truck. He never brought back a Turnel had repeatedly tryed to obtain a manifest torn to Tunnel. tron Barone, could not contact him by phone. mr. Urcioly but Some me by the name of Tarrats his gract KNOW after this shipment to had read about Barene getting in toouble with the state in a newspaper Il share of Assector

hate of turbection 1-99-03 Facility Name A-3 Glack Barriel EPA ID No. HW/EF No. · NJD084009371 Comments, observations, summary teld that this shipment was in violation of EPA's regulations. FACILITY Inspection lity inspection indicated and plastic drams was between them brown-yellow material in a pur during the spill residue from petentially hozardous cleaned up and placed into a draw immediatly. He agreed to do this.

Sygnature of Anspector

Describe the activities that result in the generation of hazardous waste.

The only has worte generated at this facility on a regular basis is waste cranksase oil from servicing their trucks (NJ, HAZ worte as of 1-83).

Buring a 3/9/31 initial RCRA inspection of Tunnel

Bassel & Drum a spill of caustic material (determinal to be inspective) was noted on soil. Three 30 gal.

drums of centaminated soil wore generated from this clamp. This is the only other waste produced.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

in a JED gol. capacity storage tank. This oil is

temound by Bills wante Oil 430 Ridge Rd. Lyndhurst, NJ.

NJSWA transporter permit #5-6639AB to Bil Oil Newark, NJ.

Tunnel close not have any recipts for the

femeral of work oil on file. They did have Bills waste

Oil's permit # pellement. written on a blank Bills waste

oil receipt.

The best oil tenk is stored out side of the building.

This tank was unlabeled, stored on asphilt, had no protection

from vehicle backing into it, and had some spillage at its back

(Sludge-small amount). Mr. Ulciel; stated that the spillage

will be cleaned up and a barrier protecting the tank will be

installed. The world "waste oil" were written on the tank

in red paint during the inspection. Mr. Uccioli was informed of Not

Is there reason to believe that the facility has hazardous waste on-site?

a.	If yes, what leads you to believe it is hazardous waste? . Check appropriate boxes:
	Company admits that its waste is hazardous during the inspection.
XĮ	Company admitted the waste is hazardous in its RCRA notification and/o Part A Permit Application.
<u> </u>	The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
	The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
	The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
	Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
	Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) waste oil is a NJ her. work.
_	Mr. urcioli stated that His Co. does not
6	en, Trans, or TSP. hazardous waster see comments
Sec	ction.

# GENERATOR DISPECTION CHECKLIST

	40 CFR 262 Subpart A-General	
		YES NO N/A
	262.11 - Hazardous waste determination	company states it
	<ol> <li>Did the generator test its waste to detarmine whether it is hazardous?</li> </ol>	x does
	Is the waste hazardous?	- X Shot Gen
	2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	masta.
	40 CTR 262 Subpart 8-The Manifest	
	Has hazardous waste been shipped off-site since November 19, 1980?	<u>×</u>
te Bar	If ves. approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. One unman fortel shipment of high ph some Bassal & Osum C. Paterson, No. O. Three 2 350	Pill Cleanup material.
	262.21 Does each manifest (or representative sample) have the follow information? Please circle the missing elements.	rud
	- a manifest document number?	
	the generators name, mailing address, telephone number and EPA I.S. Number?	n/A
	— the transporters name and EPA I.D. Namoer?	manifest
	- the name, address and EPA ID Number of the designated facility?	used
	— a description of the wastes (DOT)?	
	- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?	che spill Cleanup shipment.
	— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	254.011
	(obtain a copy of the incomplete manifests)	
	40 CFR 262 - Subcart D - Recordkeeping and Reporting	
	262.40 Has the generator maintained facility records since Nov. 19, 19807 (manifest, exception report and waste analysis)	
	262.42 Has the generator received signed copies (from the TSD facility of all the manifests for waste shipped off-site more than 35 days ago?	X 
	If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?	<u> </u>
materi Tunne	No manifest used for shipment quel noted during the 3/4/8/ Repairspection ple Bonul & Drum. Waste oil is not man	Par Crem and

40	<b>CFR</b>	252	-	Subsart	C	_	Statistation	Permi ramenta
-			-					

	There is a light with the second are
262.30-33 Befor	e transporting or offering hazardous waste for transportation ite does the generator:
1)	Package the waste in accordance with applicable CCT regulations (i.e., 49 CFR Parts 173, 178 & 179)
2) 1	Label each package according to DOT (i.e., 49 CFR 172)
3) 8	Mark each package according to DOT (i.e., 49 CFR 172)
<b>4</b>	Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Promibits Improper
s r	Disposal. If found, contact the nearest police or public safety authority or the U.S. TPA, "and include the generators name, address and manifest document number. (i.e., 49 TR 172.304)
262.34 <u>Accumula</u>	ITLICT Time
1) H	iow is waste accumulated on-site?
	Containers
	A Tarks waste oil tank, one 150 gal. tent.
	Surface impoundments (complete NAME checklist)
	Piles (complete SWMF checklist)
. 2) I	s waste accumulated for more than 90 days?
I.	F yes, complete SMF checklist waste 0:1
3) <u>r</u> a	s each container clearly dated with each period of commulation so as to be visible for inspection?
W	s each container or tank marked or labeled with the fank only ords "hazardous waste" or in compliance with the

Tank not labeled.

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

750 Checklist is completed.

Note: since this co. does not gen. > 1001 gas. waster oil within a 90 day period on even in a year, they do not have to maintain manifest records for waster oil only shifting documents on receipts have to be maintained as & 1-83.

### 262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

# 40 CFR 265 - Subpart I Containers

265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of wasta (e.g., 12 fifty-five gallon drums of wasta acetone).

9	allon drums of waste acetone).	• .	
265.171 - D	to the containers appear to be In good condition, not in anger of leaking?	.*	
<u>I</u>	f not, please describe the type, condition and number of eaking or corroded containers. Be detailed and specific.		
ille.	re hazardous waste stored in containers made of compatible aternals?		-
265.173(a) -	- Are all containers closed except those in use?	·	
265.173(b) -	O containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	-	
265.174 -	Is the storage area inspected at least weekly?		
265.176 -	Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	<u> </u>	

265.177 - Are incompatible wasts stored separate from each other?

		YES	7,00	N/A	
40 CFR 2	65 Subpart J - Tanks				
265.190	1) What are the approximate number and size of tanks containing hazardous waste?				
	2) Identify the waste treated/stored in each tank.				
265.192	- General Coerating Requirements		•		
	<ol> <li>Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?</li> </ol>	_	—,*-		
	If no, please explain.		•		
	2) Are there leaking tanks?				
	3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?				
	4) Do uncovered tanks have at least 2 feet of freeDoard or an adequate containment structure?	_			
	<ol> <li>If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank e.g. bypass system to a stancby tank</li> </ol>	k? _		~	
265.194	- Inspections				
	1) Is the tank(s) inspected each operating day for a) discharge control equipment b) monitoring equipment c) level of waste in tank	_	_		_
	2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?				
	3) Are there underground tanks?	_			
	If yes, now many and can they be entered for inspection?				
265.198	- Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or react	ian?			
	If no, please explain.				
265.199	- Does it appear that incompatible wastes are being stor separate from each other?	ed			

265.16 - Personnel Training N/A TSD Completed
1) Have facility personnel successfully completed a program of classroom instruction or on-the-joo training within 6 months of having been employed?
If yes, have facility personnel taken part in an annual review of training?
2) Is there written documentation of the following:
—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?
—type and amount of training to be given to personnel in jobs related to hazardous waste management?
—actual training or experience received by personnel?
3) Are training records kept on all employees for at least 3
40 CFR 265 - Subpart C - Preparedness and Prevention
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:
— an internal communications or alarm system?
— a telephone or other device to summon emergency assistance from local authorities?
— portable fire equipment? — — — —
- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.
265.33 Is equipment tested and maintained?
265.34 Is there immediate access to communications or alarm systems during hardling of hazardous waste?
265.35 Adequate aisle space?
If no, please explain storage pattern.
•
In your opinion, do the types of waste on—site require all of the above procedures, or are some not needed:  Explain.
40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?
1) Does the plan describe arrangements made with the local authorities?
2) Has the contingency plan been submitted to the local authorities?  ———————————————————————————————————
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?
4) Does the plan have a list of what emergency equipment is available?
5) Is there a provision for evacuating facility personnel?
6) Was there an emergency coordinator present or on call at the time of the inspection?

:

### Transporter Inspection Report Form

			YES	NO !	N/A	
40	O CFR Part	: 263 Transporter Standards				
	263.10 -	Does the transporter carry hazardous waste?		ナ		
	263.12 -	Does the transporter store hazardous waste at a transfer facility - if yes, how long? 10 days or lessmore than 10 days (complete TSD form)		<u>+</u>	<del>-</del> .	
	263.20 -	Manifest System				
	1)	Does the transporter have a copy for each manifest shipment of hazardous waste?	<del></del>		<u>X</u>	
	2)	Does a representative portion of the manifests show the following information (if no, circle the missing information)				
		o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature				NA
		o Transporter's name, EPA I.D. number, signature and date of signature				<
		o TSDF's name, address and EPA I.D. Number				4
		and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transp	orter.			
		o Manifest Document number				
		o Proper COT snipping description			<del></del>	
		o Quantity & type of containers				
		(If no, to any of the above obtain copies of incomplete m	anifes	sts).		
	3)	Based on available information, do all manifests conform to the hazardous waste snipments made? If no, explain			1	
	262.22 -	Have records been kept since November 19, 1980?			<u>x</u>	
	263.30 -	Has there ever been a spill or discharge of hazardous waste during transportation?			<u>X</u>	
		If yes, was the incident report submitted to DOT? (obtain copy of the report)			<u>x</u>	
	263.31 -	If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.			<u>X</u>	

### General Comments:

Tunnel, Glack, and Monocrete only transport empty drums, mr. uncial stated that they have a Ny transporter of haz. woode permit, required for hauling empty drums that once contained haz. woode, but they do not have No DEP transporter permits. This co. intends to keep its haz waste transporter status in case the regulations for transporting empty drums is even changed.

YES NO N/A

# 40 CER Part 265 Subpart B General Facility Standards

265.13-General	Waste	Analysis	
		7,318	

7		
٠.	Is there a detailed chemical and physical analysis of a (At a minimum this analysis or each waste)	
	remarks a detailed chart	
	coresentative same and physical	
	(At a minimum sample of the imprisical anavisia	
	inform this analytic waste or each in its or a	
	representative sample of the waste or each waste?  (At a minimum this analysis must contain waste?	
2)	Doc-	
-,	information necessary for proper management of the waste)  Does the character of the waste handled at the facility frequent testing?	
	change from day to day, week to week, etc., thus required you may check only one	7
	tion day to day	_ <
	regions teating day, week to week to the facility	
	You may check only on	
-	may check only on-	

hange from day to day, week to week, etc., thus requiring You may check only one Waste characteristics vary

All waste are basically the same Company treats all waste as hazardous waste oil only.

3) Is there a written waste analysis plan at the facility? Does it contain the following:

- a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.
- b) Test methods used to test these parameters.
- c) Sampling methods to obtain a representative sample of
- d) Frequency of repeated analysis to ensure accurate and
- 4) Does hazardous waste come to this facility from an outside
- 5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the

# 265.14-Security

- 1) Is there: a) a 24-hour surveillance system? or,
  - b) a suitable barrier which completely surrounds the active portion of this facility?
- 2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted

If no, explain what measures are taken for security.

Just lock down tructor's one alarmed, office

# 265.15 - General Inspections Requirements

- 1) Does the facility have a written inspection schedule?
- 2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?
- 3) Does the owner/operator record inspections in a log?
- 4) Is there evidence that problems reported in the inspection If no, please explain.

265.16 - Personnel Training	YES NO N/A
<ol> <li>Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?</li> </ol>	_ }
If yes, have facility personnel taken part in an annual review of training?	·
2) Is there written documentation of the following:	
—job title for each position at the facility related to hazardou waste management and the name of the employee filling each job?	5
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	)
-actual training or experience received by personnel?	> 1/2
3) Are training records kept on all employees for at least 3 years?	· · · · · · · · · · · · · · · · · ·
265.17-General Requirements for Ismitable, Reactive or Incompatible	
<u> AASTES</u>	3
1) Are there ignitable, reactive or incompatible waste on site?	- on sure
1) Are there ignitiable, reactive or incompatible waste on site?  If yes, what are the approximate types and quantities and I make a location of the waste.  Ignitelle Sin	not sure if 45t. Oil is we it was never testep.
2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?	
If no, please explain.  No apparent precentions for weak oil s	storage tonk,
<ol> <li>In your opinion, are proper precautions taken so that these wastes do not:</li> </ol>	
- generate extreme heat or pressure, fire or explosion, or violent reaction?	_ <i>x</i> _ )
— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?	X Completed
— damage the structural integrity of the device or facility containing the waste?.	x - for
- threaten human health or the environment?	$-\frac{x}{2}$
No real precentions taken, Oil is just	
Stored in a small horizontal tank	

1-

40	O CFR 265 - Subpart C - Preparedness and Prevention	YES NO N/A
2	265.32 Does the facility comply with preparedness and prevention requirements including maintaining:	
	- an internal communications or alarm system?	<u> </u>
	— a telephone or other device to summon emergency assistance from local authorities?	<i>X</i>
	- portable fire equipment?	<u> </u>
	— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	
	265.33 Is equipment tested and maintained?	<u> </u>
	265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	<u>X</u>
	265.35 Adequate aisle space?	4'
	If no, please explain storage pattern.	
	In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.  Only work oil on site.	
	40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedure	es
	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, expications or any unplant release of hazardous waste?	ned <u>X</u>
	1) Does the plan describe arrangements made with the local authorities?	
	2) Has the contingency plan been submitted to the local authorities?	)
	3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	\ N/A
	4) Does the plan have a list of what emergency equipment is available?	
	5) Is there a provision for evacuating facility personnel?	
	6) Was there an emergency coordinator present or on call at the time of the inspection?	/
	40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reportin	α
	265.71 - Use of the Manifest	
	1) Has the facility received hazardous waste from an off-site source since November 19, 1980?  According to mr. Urciel,	$=\frac{x}{2}$
	2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?  If por please explain	<u>X</u>

3) How many post-November 19 manifests does the facility have?  (Estimate if the number is large)
(Mathitale II the number is large)
4) Does each manifest have the following information?  (circle missing information)
— a manifest document number?
— the generators name, mailing address, telephone number and EPA I.D. ‡?
- the transporters name and EPA I.D. Number?
- the TSD name, address, telephone number & EPA I.D. Number?
— a description of the waste (DOT)?
the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded; into or onto the transport vehicle?
— a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?
(Cotain a copy of the incomplete manifests)
265.72 - Manifest Discrepancies
Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manufest?
Describe unreconciled descrepancies.
265.73 - Operating Record
1) Does the facility keep an operating record?
2) Does the record contain the following information:
a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?
b) The location and quantity of each hazardous waste at each location?
c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?
d) Summary reports and details of all incidents that require implementing the contingency plan.
e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?
f) Monitoring, testing or analytical data where required for:
Groundwater, Land Treatment, Incinerators, and
265.76 - Unmanifested Waste Report
Has the facility accepted hazardous waste from off-site sources without a manifest?
If yes, has the facility submitted an unmanifested waste report?
<del> / \</del>

40 CFR 265 Subpart F - Groundwater Monitoring	YES NO N/A
(Applies only to surface impoundments, landfills and/or land treement facilities.)	<u>ac</u> -
Is a groundwater monitoring plan available at the facility?	/
If yes, please fill out the appropriate Groundwater Monitoring Questionaire and attach to this report.	
40 CFR 265 Subpart G - Closure and Post-Closure	> WA
265.111 Closure Performance Standard	
Have any portions of the facility been closed since November 19, 1980?	
If yes, please explain	<u>-</u>
265.112 - Closure Plan	<i></i>
Does the facility have a written closure plan? (Applies to all types of TSD facilities)	_ \( \sigma \)
If yes, does the written plan include:	
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?	
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	
3. A description of the steps necessary to decontaminate facility equipment during closure?	> N/.
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?	
5. Does the cwner/operator have a written estimate of of the cost of closing the facility?	
If yes, what is it? (\$)	
265.118 - Post Closure Plan	
Does the facility have a written post-closure plan? (Applies only to disposal facilities)	X
If yes, Does the Plan:	
<ol> <li>Identify the activities which will be carried on after closure and the frequency of these activities?</li> </ol>	
	)
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?	
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
4. Include the name, address and phone number of a person or office to contact during post-closure?	
5. Does the cwner/operator have a written estimate of the cost of post-closure for the facility?	:
If yes, what is it? (\$)	

-

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

		•					
Stora	ice	Treatment	<u>D</u>	isposal			
Container -	- pg 6	Tank - pg 7	Lan	dfill - pg ll	L		
Tank, above	ground-pg 7	Surface Impoundmen	t-pg 8 Lan	d Treatment -	- pg 10		
Tank, below	ground-pg 7	Incineration - pg	12 Sur	face Impoundn	ments - pg 8	3	
Surface Imp	oundments-og 8	Thermal Treatment-	pg 12 Oth	er			
Waste Piles	- pg 9	Land Treatment - p	g 10				•
Other		Chemical, Physical Biological Treatme					
	*	Other					
					YES NO	N/A	
40 CFR 265	- Subpart I -	Containers			`		
D	escribe the si	ntainers are used f ze, type, quantity -five gallon drums	and nature o	of waste			
			٠,				
2) - T	,						
2, - 1. p	recipitation?	airment system for :	spilis, leax	s and			
I	f yes, describ	e.					
	•	•					
265.171 - Do	o the containe anger of leaking	rs appear to be in que;	pod conditi	on, not in			
If le	eaking or corn	describe the type, on the describe the described	condition and detailed a	d number of nd specific.	•		> Nu
265.172 - Ar	re hazardous w uterials?	aste stored in conta	iners made	of compatible	-	-	74
<u>If</u>	not, please	explain.					\
		*					
265.173(a) -	- Are all cont	ainers closed except	: those in u	se?			
265.173(b) -	or stored in	a manner which will a manner which will iner nupturing or le	minimize t	handled he risk			
265.174 -	Is the storag	ge area inspected at	. least week	ly?			
265.176 -	Are container at least 50 i property line	rs holding ignitable Teet (15 meters) <u>awa</u> a?	and reacti Y from the	ve waste loca facility's	ited	-	
265.177 -	Are incompation other?	ble wastes stored s	eparate from	n each			
	If no, explai	n				<del>7 '</del>	

265.190 1) What are the approximate number and size of tanks
2) Identify the waste treated/stored in each tark. Jal Capacity
approx. 40-50 galo, presently storal in tank
ank is used  1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?
or past, present, or risk of ruture leaks?  If no, please explain.
at is when the company's trucks could easily back into tank and rapture it.
ucks are serviced. 2) Are there leaking tanks?
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank?  e.g. bypass system to a standby tank
265.194 - Inspections
1) Is the tank(s) inspected each operating day for a) discharge control equipment b) monitoring equipment c) level of waste in tank
2) Are the tarks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?
3) Are there underground tanks?
failures?  X
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?
If no, please explain.
265.199 - Does it appear that incompatible wastes are being stored separate from each other?

## TUNNEL BARREL & DRUM CO., INC.

DEALERS IN NEW & USED

# BARRELS AND DRUMS 85 TRIANGLE BOULEVARD

CARLSTADT, N. J. 07072

January 12, 1983

U. S. Environmental Protection Agency Washington D.C. 20460

Attention: Mr. John Skinner

1

Acting Director, Office of Solid Waste

Dear Sir:

First of all I sincerely apologize for this report being late, but due to the busy Holiday season and beginning of new year activity and general confusion, I did not have time to submit this by January 10.

The reason for me sending this letter rather than just filling out the forms which were sent by your office is that the three companies listed

Tunnel Barrel & Drum Co., Inc. Monocrete Container and Drum Co. Gluck Barrel & Fiber Drum Co.

do not qualify as handlers, generators, storers or transporters of hazardous waste. As you can see from the information on the enclosed form #OMB:2050-0005, the only hazardous product of any kind which our three companies have come in contact with is waste oil from engines and transmissions which is accumulated in the normal servicing of our company vehicles.

I would therefore like you to remove our three companies from your list of companies which handle, generate or store hazardous wastes. Our company buys and sells used steel drums which did have hazardous waste in them but in accordance with the regulations set forth by your office, these drums are empty and not considered hazardous waste. When the regulations were first published, empty drums were considered hazardous waste and if the law was to be enforced, our company would be forced out of business. We therefore filed for the proper permits so that we did not have to close down our business. As you now know, the regulations have been changed or clarified so that an empty drum is not considered hazardous waste and we can therefore continue our operation and provide a very necessary service to the companies with which we do business.

I hope that I have shown you clearly the reason for us filing initially and why I would now like to be removed from your list of companies having hazardous waste activity. Also, after talking to Mr. Tom Piccone, U.S. EPA Region II, Permits Admin. Branch, I would like to still keep my EPA permits which would qualify me as a transporter of hazardous waste. The reason for this would be that if some time in the future the regulations would change, we would already have a permit to transport hazardous waste and our business would not suffer any interruption. If there is any other information you need or forms that have to be filled out please call and I will take care of it immediately.

Sincerely,

TUNNEL BARREL & DRUM CO., INC.

Joseph Binder Jr.

JB/cy

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## 1981 STATUS SHEET FOR NON-REGULATED FACILITIES

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY FACILITIES THAT DID NOT TREAT, STORE, OR DISPOSE OF HAZARDOUS WASTE IN 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 FACILITY ANNUAL REPORT If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, complete section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

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the certification at the bottom of this page and return it to your EPA Regional Office by lamuary 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.	
S-I. FACILITY EPA I.D. NUMBER  T/A C    N   D   0   0   1   6   D   /   1   5   2   1   1    1 2   13   14   15	
S-II. NAME OF FACILITY	
TIMNINIELI BIAIRRELLI & DIRIUM CO ITNICI	69
City or Town . State	n oil which was,
S.V. CERTIFICATION  I certify under penalty of law that the installation identified above did not treat, store of dispose of has to the best of my knowledge this facility is not subject to the RCRA Annual Reporting requirement.  To seph Binder Jr. Secy. Treas.	izardous waste during 1981 and that
Print/Type Name Title Signature of Authorized Representative	Date Signed

# 1981 STATUS SHEET FOR NON-REGULATED GENERATORS

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INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZ-ARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981

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Transport .

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14.  W.



GENERATOR ANNUAL REPORT. If you received a pre- printed label attached to the envelope in which this form wassenclosed, affix it in the space provided, circle the ap- propriate code in section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Of- fice by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the contest information in the appro- priate section below. If you did not receive a preprinted label, compilere all sections.
S-I. GENERATOR'S EPA I.D. NUMBER
FNJJD10101/16101/11/5121 11 1 2 13 14 15
S-II. NAME OF FACILITY
TIWNINIEL BARREL & DRUM CO FINC
S-III. FACILITY MAILING ADDRESS
15 16 Street or P.O. Box
14 C A R L S T A D T   N J U 7 D 7 2 State Zip Code
S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)  a. NON-HANDLER—did not handle hazardous waste in any quantity in 1981
b. SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR \$261.5)
c. EXEMPT—all wastes generated in farming operations (40 CFR §262.51) or exempt pursuant to 40 CFR §261.4
d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR \$261.2 and 40 CFR \$261.6
e. CLOSED—installation was closed prior to 1981
S-V. CERTIFICATION  I certify under penalty of law that the installation identified above did not handle egulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RCRA Applical Reporting requirement.
Joseph Binder Jr. Secy-Trees populated 1/12/83
Print/Type Name Title Signature of authorized Representative Date Signed.

# 1981 STATUS SHEET FOR NON-REGULATED

INSTRUCTIONS: THIS SHEET MUST BE COMPLÉTED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZ-ARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RERA BUT DID NOT MANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section 5-1V, sign the certification at the bottom of this page and return it to your EPA Regional Of-fice by January 10, 1963 in the return envelope provided. If

という 本人の意味をいることには、一般のないでは、一般のできませんできます。

through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.	
S-I. GENERATOR'S EPA I.D. NUMBER	SA STATE OF SAME
1 2 13 14 15	7
S-II. NAME OF FACILITY	
MICINICIPATE CONTAINMER & DRUM CO FNC	
30	<b>6</b> 9
S-III. FACILITY MAILING ADDRESS	\$1830 <b>~3</b> 50 <b>%</b> 0.5 <b>4</b> 00
3851 TRIAMELE BLUD 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
15 16 Street or P.O. Box	
[4] CIAIRIAISITIAIDITI	
15 16	**
City or Town State ' Zip Code	
S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)  a. NON-HANDLER—did not handle hazardous waste in any quantity in 1984	(1)
b. SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR #261.5)	**
c. EXEMPT—all wastes generated in farming operations (40 CFR §262.51) or exempt pursuant to 40 CFR §261.4	4
d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR \$261.2 and 40 CFR \$261.6	5
e. CLOSED—installation was closed prior to 1981	9
	· Salvaria
S-V. CERTIFICATION  I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during that to the best of my knowledge this installation is not subject to the RCPA annual Reporting requirement.	
Town Birth & South	110-
Print/Type Name Title Signature of Authorized Representative Date Signature	12/X5

# 1981 STATUS SHEET FOR NON-REGULATED

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZ-ARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line



through it and provide the correct information in the appro- priate section below. If you did not receive a preprinted label, complete all sections.
S-I. GENERATOR'S EPA I.D. NUMBER
1 2 13 14 15
S-II. NAME OF FACILITY
GLUCK BARREL & FIBRE BRUM COI
S-III. FACILITY MAILING ADDRESS
3 8 5   T R    A  N C L E   B L V D
15 16 City or Town    AC   P  R  L  5  T  P  D  T
S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)  a. NON-HANDLER—did not handle hazardous waste in any quantity in 1981
b. SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR \$261.5)
c. EXEMPT—all wastes generated in farming operations (40 CFR \$262.51) or exempt pursuant to 40 CFR \$261.4
d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR \$261.2 and 40 CFR \$261.6
e. CLOSED—installation was closed prior to 1981
S-V. CERTIFICATION

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I certify under penalty of law that the installation identified above did not bandle regulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RCRA A nnual Reporting requirement.

Joseph Binder Jr. Secy-Treas Print/Type Name Signature of Authorized Representative Title Date Signed :

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F	100	843	D C	tbs. Grease		Tires, Tubes	
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1.3	Work Authorized by X		\	Date Promised	-	TAX	17.35

Repud Appellen of the

# TUNNEL BARREL & DRUM CO., INC.

DEALERS IN NEW & USED

### BARRELS AND DRUMS

#### 85 TRIANGLE BOULEVARD

CARLSTADT, N. J. 07072

January 12, 1983

U. S. Environmental Protection Agency Washington D.C. 20460

Attention: Mr. John Skinner

Acting Director, Office of Solid Waste

Dear Sir:

First of all I sincerely apologize for this report being late, but due to the busy Holiday season and beginning of new year activity and general confusion, I did not have time to submit this by January 10.

The reason for me sending this letter rather than just filling out the forms which were sent by your office is that the three companies listed

Monocrete Container and Drum Co. NADOCCA9303790
Gluck Barrel & Fiber Drum Co. NADOCCA9232

do not qualify as handlers, generators, storers or transporters of hazardous waste. As you can see from the information on the enclosed form #OMB:2050-0005, the only hazardous product of any kind which our three companies have come in contact with is waste oil from engines and transmissions which is accumulated in the normal servicing of our company vehicles.

I would therefore like you to remove our three companies from your list of companies which handle, generate or store hazardous wastes. Our company buys and sells used steel drums which did have hazardous waste in them but in accordance with the regulations set forth by your office, these drums are empty and not considered hazardous waste. When the regulations were first published, empty drums were considered hazardous waste and if the law was to be enforced, our company would be forced out of business. We therefore filed for the proper permits so that we did not have to close down our business. As you now know, the regulations have been changed or clarified so that an empty drum is not considered hazardous waste and we can therefore continue our operation and provide a very necessary service to the companies with which we do business.





I hope that I have shown you clearly the reason for us filing initially and why I would now like to be removed from your list of companies having hazardous waste activity. Also, after talking to Mr. Tom Piccone, U.S. EPA Region II, Permits Admin. Branch, I would like to still keep my EPA permits which would qualify me as a transporter of hazardous waste. The reason for this would be that if some time in the future the regulations would change, we would already have a permit to transport hazardous waste and our business would not suffer any interruption. If there is any other information you need or forms that have to be filled out please call and I will take care of it immediately.

Sincerely,

TUNNEL BARREL & DRUM CO., INC.

Joseph Binder Jr.

JB/cy

CHARLES M. SHAPIRO AND SONS, P.C.

### CONSULTING ENGINEERS

615 COURT STREET. BROOKLYN. N. Y. 11231

(212) 596-1902

80-152

ENVIRONMENTAL ENGINEERING

FACILITIES ENGINEERING

CRANE & RIGGING ENGINEERING

Charles M. Shapiro, P.E. 1946-1958

Howard I. Shapiro, P.E.

Elliot J. Shapiro, P.E.

November 19, 1980

New Woodbridge Barrel Co., Inc. 28 Peerless Place Newark, New Jersey 07114

Ng D061303790

Gentlemen:

Enclosed is a copy of the RCRA Permit Request submitted to the U.S.E.P.A. this date.

Upon receipt of an application package from EPA, please advise me.

Yours traly

EJS:LS Enc.

cc: CIA

ELLIOT J. SHAPERO, P.E.

# CHARLES M. SHAPIRO AND SONS, P.C.

CONSULTING ENGINEERS
615 COURT STREET. BROOKLYN. N. Y. 11231

(212) 596-1902

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CRANE & RIGGING ENGINEERING

Carrles M. Shapiro, P.E. 1946-1968

Howard I. Shapiro, P.E.

Elliot J. Shapiro, P.E.

November 19, 1980

U. S. Environmental Protection Agency, Region 2 Information Service Center 26 Federal Plaza. Manhattan, New York 10007

Subject: REQUEST FOR RCRA PERMIT FOR A TREATMENT, STORAGE OR DISPOSAL FACILITY

REF.: (1) The New Woodbridge Barrel Co., Inc. 28 Peerless Place
Newark, New Jersey 07114

EPA I.D. # NOT RECEIVED

### Gentlemen:

It is requested that a permit to treat, store or dispose be issued to the above indicated existing establishment. A request for "Part A" has been submitted and will be submitted upon receipt.

EJS:LS

cc: New Woodbridge

LLIOT I SHAPIRO, P.E. ENGINEER FOR THE PERMITTEE

And Sol L

C 2 Fr. 18)

U. S. Environmental Protection Agency, Region 2 Information Service Center 26 Federal Plaza Manhattan, New York 10007

Subject: Request for RCRA Permit to Transport, Treat, Store or

Gentlemen:

Enclosed are permit requests for the following establishments:

National Drum & Barrel Corp., 35 Beadel St., Brooklyn, N. Y. NV PO 47699 06 167RA H. M. Roberts Steel Drum, 157 Spencer St., Brooklyn, N. Y. Ny DOOO 7 08149-6,784 Phoenix Cooperage Co., Inc., 292 Scholes St., Brooklyn, N. Y. NY DOC62239306/2 Goodman Bros. Steel Drum Co., Inc., 18 Division Place, Brooklyn, N. Y. NY DOC768377 = Acme Albert Steel Drum Inc., 1050 Grand St., Brooklyn, N. Y. W. Dooo390 7/6 Ban, TRAG Acme Albert Steel Drum Inc., 1000 Stand Dr., Carlstadt, N. J. N. J Gluck Barrel & Drum Co., 85 Triangle Blvd., Carlstadt, N. J. NJD00069423LNotr Monocrete Container & Drum, Inc., 85 Triangle Blvd., Carlstadt, N. J. NJD 0653056 Monocrete Container & Drum, Inc., of IIIangs Place, Newark, N. J. Noble New Woodbridge Barrel Co., Inc., 28 Peerless Place, Newark, N. J. Noble Research

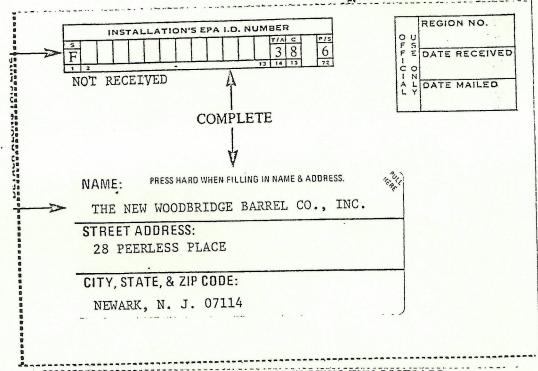
EJS:LS ·

ENGINEER FOR THE PERMITTEE

The New Woodbridge Barrel Co., Inc.

lutter send belig T&D

Never got in.



## INSTRUCTIONS FOR COMPLETING THIS POSTCARD

Installation's EPA I.D. Number — If you were included in EPA's Mass mailing of notification packets or if you have filed a notification with EPA and have received an Acknowledgement of Notification of Hazardous Waste Activity enter your Installation's EPA I.D. Number in these boxes *(one letter or supplied to the letter or l* number per box). Otherwise, leave this item blank.

Mailing Label — Enter the name and address where you want EPA to send your Part A packet (Form 1 and Form 3 of the Consolidated Permits Application). DO NOT remove label, leave attached to postcard.

After completing the postcard, detach it, affix the proper first class postage, and mail. For your own records, you may enter the date the postcard is mailed to EPA.

Retain this portion for your records. 11/19/80

11/19/80 DATE MAILED

80-152 No. 878351
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ENVIRUE AGENCY DECTION
NEW YORK, H.Y. 10007

# RCRA INSPECTION FORM

PA,3

Report Prepared for:	177
Generator	
Transporter 7	
HWM (TSD) facility	
Copy of report sent to the facility /	
	Facility Information
Name:	Monocrete Container Co., Inc
Address:	85 Triangle Blud.
	85 Triangle Blud. Carlstadt, NJ. 07072
	NJ 0069303790
State or EPA Personnel:	Participating Personnel  Al Jannusti Jr.
Facility Personnel:	Anthony Uncialites Joseph Binder, sec-Treasurer
Report Prepared by Name:	4/0/10
Agency:	Alphanse Fonneszi Jr. NJ-DEP
	201-648-3669.
Approved for the Director by:	

## NOT FOR RELEASE TO COMPANY, PROTECTED INFROMATION

PAB

3

Summary, Conclusions and Recommendations
Tunnel Barrel + Pram, Glack Barrel + Drum Co.
and monocrete Container and Drum Co. are all
the some company. To
The said the said of the Adams of the State of the said of the sai
The state of the s
It is recommended that Teinnel be fined for the 3 drum of
cleanup material that was not manifested off site for,
y not using a manifest,
2) sending work to an anauthorized TSDF, (Barone
Barrel : Drum Co. Paterson, NJ.).
All other paper violations should not be
enforced since Tunnel is not a Gen or TIDF
and they recently requested IPA to remove this.
Status.

## Summary of Findings

## Facility Description and Operations

Glack Barrel & Drum Co. (NJ0008694232), Tunnel Barrel ? Drum Co. Inc. (NJDDO1601152), and Manacrete Container Co., Inc. (NJ0069303790) one all the same company operating out of one building on 85 Triangle Blud. Carlstalt, NJ. All three registered as a Gen, Trans, : TSDF. The reason for having all three co's listed at the same address is due to Tunnel buying out Glack and monowate. Since Tunnel didn't want to loose any of the other two company's customers they kept their name. Since they maintain Gluck and monacreto names they also registered all three company's for hazardow work activity. This company is a drum recorditioner of fiber pack Used fiber pack drums are bought from customers, weaked, wired or steamed out (wooh water is discharged to Bergen County Utilities Authority Little Ferry, NJ. sewage treatment plant), fainted, and sold to customers as reconditioned drams. Empty metal and plastic drums are received, catagorized according to size and type, and sold to draw reconditioners. No cleaning of these drums occur one sold to AcmE Albert 1050 Grand Ave. Brooklyn, My, & Jacob Kline Cooperage Allentown, PA., and a Central steel Drum Plastic contained hazardows workers then draws on notes on site had business be and flammable labelyon them

Tunnel registered on a Gen, Trans, TSPF, due to recommendations

HW/EF No.

Comments, observations, summary

from their lauren. After the realized that the regulations (RCRU) Attacked is a letter from Mr. Binder representing all three Companyis to EPA washington, D.C. 1 accompanying an EPA 1981 Status sheet for non-regulated Generators (for all 3 company's) and a / facility form (for tunnel). This all three company's would like to remove their General TSPF Status and texp their trans. status Three 30 gal. drums of caustic spill cleanup matrial was a councilated in 3/81. This spill was noted during an initial RCRA inspection of Tunnel by me on 3/9/81 (See pag. B). Tunnel does not have a manifest for these druns and stated that Barone Barrel: Drum Paterson, At removed there draws sometime in 4/21. Without a manifest Tunnel use to have a truck repair out fit operating out of the same burlding "mrc Trucking". Barone had brought one of its tracks in for repair, and Turned had detected the price for dispering of these drums from the repair billi (see attacked repair bill dated 4-30-81). Mr. Urciali statel that Barone never left a manifest because he did not have a form on his truck. He never brought back a torm to Tunnel. Tunnel had rejectely tried to obtain a manifest from Barone, but could not contact him by phone. Mr. Urcioli Some are by the name of Tarrats know his gract affluer. a few works after this shipment he had read about Barene getting in trouble with the state in a newspaper. Alghan Campigation Signature of Facility Representative

HW/EF No.

Mr. Urcioli was teld that this shipment was in violation of
both DEP = EPA's regulations.
FACILITY Inspection
The facility inspection indicated that there were
empty fiber and metal druns stored inside of the building.
Some metal and plastic drams was stored outside & the
building in an ally between their building and the
Next building north of Tunnel. A spill approx 12'x3's
a brown-yellow material I in a puddle of water in this
ally was noted. Mr. Urcisli determined that this woo
paint use to paint fiber drums. He had one of his men
put saw dust on it during the inspection. Mr. urexli
was told that any spill residue from droms labeled flammable,
corresive on any other petentially hazardous material must be
cleaned up and placed into a dram immediatly. He agreed
to do this.
mr. Binder stated that he will send a letter to
me concerning the disposal of the caustic spill material
sent to Barone and also include this copy with the NUDER
annual manifest refort.

Describe the activities that result in the generation of hazardous waste.

The only has waste generated at this facility on a regular basis is waste cranksase oil from servicing their trucks (NJ. HAZ. waste as of 1-83).

During a 3/9/8/ initial RCRA inspection of Tunnel

Bassel & Drum a spill of caustic material (determinal to be inspective by ApH pages text) was noted on soil. Three 30 gal.

drums of contaminated soil was generated from this cleanup.

This is the only other waste produced.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

in a JED gol. capacity storage tank. This oil is

semoual by Bills Waste Oil 430 Ridge Rd. Lyndhurst, NJ

MJ SUA stransporter formit # 5-6639AB to Bil oil Newark, NJ

Tunnel slow not have any recipts for the

femeral of waste oil on file. They did have Bills waste

Oil's permit # jellen, etc. written on a blank Bills waste

oil receipt.

The west oil tenk is stored out side of the building.

This tank was unlabeled, stored on augholts had he protection

from vehicle backing into it, and had some spillage at its base

(Sludge-small amount). Mr. Useicli stated that the spillage

will be cleaned up and a bacrier protecting the tank will be

installed. The words "waste oil" were written on the tank

in sed paint during the inspection Mr. Useicli was informed g No's

new waste oil regulation and was tell to capt operat boy 1821-1516 for accept of these re-

Is there reason to believe that the facility has hazardous waste on-site?

a.	If yes, what leads you to believe it is hazardous waste? . Check appropriate boxes:
	Company admits that its waste is hazardous during the inspection.
Ø	Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
	The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
	The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
	The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
	Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
Ø	Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) waste oil is a NJ here.
G	mr. urcioli stated that His Co. does not en, Trans, on TSP. hazardous waster see comments tion.

# GENERATOR ENSPECTION CHECKLIST

40 CR 262 Subcart A-General	
262.11 - Hazardous waste determination	YES NO N/A
1) Did the generator test its waste to determine whether it is hazardous?	company state it
Is the waste hazardous?	X Chor Gen
2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?	X does to hot ben has.
40 CR 262 Subpart B-The Manifest	
Has hazardous waste been shipped off-site since November 19, 1980?	X
If ves, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. Only unman, firsted shipment of high ph to Barone Barral + Orum & faterson, No. O Three 5 350 262.21 Does each manifest (or representative sample) have the following the faterson.	
262.21 Does each manifest (or representative sample) have the followinformation? Please circle the missing elements.	ing shipments.
- a manifest document number?	
the generators name, mailing address, telephone number and EPA I.D. Number?	NIA
- the transporters name and EPA I.D. Number?	/no
- the name, address and EPA ID Number of the designated faculity?	- uses
- a description of the wastes (DOT)?	for
— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?	cae spill
— a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?	shipment or ust.o.
(obtain a copy of the incomplete manifests)	/
40 CFR 262 - Subpart D - Recordkeeping and Reporting	
262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)	_ X
262.42 Has the generator received signed copies (from the TSD facility of all the manifests for waste shipped off-site more than 35 days ago?	× ×
If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?	<u>×</u>
material noted having used for shipment &	
the 2/4/8/ RPA in and	
Tunnel Bonel & Drum. Waste oil is not man	ertornes of

YES	170	/ -
7	NO	N/A
		31/6
	-	

40 CFR 252 - S	ubtart C - Pretransportation Requirements
262.30-33 Berio off-	re transporting or offering hazardous waste for transportation
1)	Package the wasta in accordance with applicable Out regulations (i.e., 49 CTR Parts 173, 178 & 179)
. 2)	Label each package according to DOT (i.e., 49 CFR
- 3)	Mark each package according to DOT (i.e., 49 CTR 172)
	Mark each container of 110 gallons or less with the words "Fazardous Waste - Federal law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA." and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304)
262.34 Accessul	ation Time
1)	How is waste accumulated on-site?
	Containers
	Tranks vaste oil tank, one 150 gal. tent.  [ Surface impoundments (complete AME checklist)
	Piles (complete BMF checklist)
. 2)	Is waste accumulated for more than 90 days?
	If yes, complete SMF checklist wask oil
3)	Is each container clearly dated with each period of accomplation so as to be visible for inspection?
4)	Is each container or tank marked or labeled with the tenk and

words "hazardous weste" or in compliance with the DOT labeling requirements?

Tank not labeled.

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

750 Checklist is completed.

Note: Since this co. does not gen. > lool gas. waste oil within a 90 day period or even in a year, they do not have to maintain manifest records for waste oil only shiffing documents on receipts have to be maintained as 81-83.

N/A TOD completed

## 262.34 - SACRE TERM ACCIMULATION STANDARDS

. .

(For generators who accumulate waste in tanks or containers for 90 days or less)

YES 30 3/A 40 CR 265 - Subpare : Containers 265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of wasta (e.g., 12 fffry-five gallon drams of waste acetone). 265.171 - Do the containers appear to be-In good condition, not in danger of leaking? If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific. 265.172 - Are hazardous waste stored in containers made of compatible materale? If mot. please explain. 265.173(a) - Are all manainers closed except those in use? 265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking? 265.174 -Is the storage area inspected at least weekly? Are containers holding ignitable and reactive waste located 265.176 at least 50 feet (15 meters) away from the facility's property line? Are incompatible wasts stored separate from each other? 265.177 -

	YES NO N/A
40 CTR 265 Subcart J - Tanks	<u> </u>
265.190 1) What are the approximate number and size of tanks containing hazardous waste?	
2) Identify the waste treated/stored in each tank.	
265.192 - General Operating Requirements	•
<ol> <li>Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?</li> </ol>	<del>,*</del>
If no. please explain.	
2) Are there leaking tanks?	
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	
,	<del></del>
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank e.g. bypass system to a stancby tank	
265.194 - <u>Inspections</u>	
Is the tank(s) inspected each operating day for     a) discharge control equipment	
. b) manitaring equipment	
c) level of waste in tank	
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	
3) Are there underground tanks?	
If yes, how many and can they be entered for inspection?	
265.198 - Are ignitible or reactive wastes stored in a manner which protects them from a source of ignition or reactive.	ion?
If no, please explain.	
265.199 - Does it appear that incompatible wastes are being store separate from each other?	×d

	YES	700	N/A
265.16 - Personnel Training N/A 750 Completel			
<ol> <li>Have facility personnel successfully completed a program of classroom instruction or on-the-joo training within 6 months of having been employed?</li> </ol>	_		_
If yes, have facility personnel taken part in an annual review of training?		_	
2) Is there written documentation of the following:			
—job title for each position at the facility related to hazardo waste management and the name of the employee filling each job	us ?	_	
—type and amount of training to be given to personnel in jobs related to hazardous waste management?			
-actual training or experience received by personnel?	_		_
3) Are training records kept on all employees for at least 3 years?	_	· .	
40 CFR 265 - Subpart C - Preparedness and Prevention		A an	
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:			
— an internal communications or alarm system?		_	
— a telephone or other device to summon emergency assistance from local authorities?		_	
— portable fire equipment?	_		_
- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.			
265.33 Is equipment tested and maintained?			
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?			_
265.35 Adequate aisle space?			_
If no, please explain storage pattern.			
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.			
40 CFR 265 - Subpart D - Continuency Plan and Emergency Procedures			
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanne release of hazardous waste?	zi 		
<ol> <li>Does the plan describe arrangements made with the local authorities?</li> </ol>		_	
2) Has the contingency plan been summitted to the local authorities?			_
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?			
4) Does the plan have a list of what emergency equipment is available?		_	_
5) Is there a provision for evacuating facility personnel?	_		_
6) Was there an emergency coordinator present or on call at the time of the inspection?		_	

#### Transporter Inspection Report Form

		YES	NO	N/A		
40 CFR Par	t 263 Transporter Standards					
263.10 -	Does the transporter carry hazardous waste?		土			
263.12 -	Does the transporter store hazardous waste at a transfer facility - if yes, how long?		<u></u>			
263.20 -	Manifest System					
1)	Does the transporter have a copy for each manifest shipment of hazardous waste?			<u>x</u> .		
2)	Does a representative portion of the manifests show the following information (if no, circle the missing information)				1	
	o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature		_			N/A
	o Transporter's name, EPA I.D. number, signature and date of signature				<	
	o TSDF's name, address and ERA I.D. Number				-	)
	and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transp	orter.		_		1
	o Manifest Cocument number				-	
	o Proper COT snipping description				/	/
	o Quantity & type of containers					
	(If no, to any of the above obtain copies of incomplete m	ani fes	sts).	/		
3)	Based on available information, do all manifests conform to the hazardous waste snipments made? If no, explain		_	*		
262.22 -	Have records been kept since November 19, 1980?			X		
263.30 -	Has there ever been a spill or discharge of hazardous waste during transportation?			<u>X</u>		
	If yes, was the incident report submitted to DOT? (obtain copy of the report)		_	x		
263.31 -	If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.			X		

#### General Comments:

Tunnel, Gluck, and Monocrite only transport empty drums, mr. uncial stated that they have a Ny transporter of haze water permit, required for having empty drums that once contained haze waste, but they do not have No DEP transporter permits. This co. intendo to keep its haze waste transporter status in case the regulations for transporting empty drums is even changed.

400 Cut
Support 3 General -
40 CFR Part 265 Subpart 3 General Facility Standards  YES NO N/A 265.13-Compare 3 General Facility Standards
265.13-General Waste Analysis
waste Analysis
4/ IS then.
representative sample of the waste or each waste?  (At a minimum this analysis must contain all information necessary for
(At a minimum this analysis must contain all the
information necessary for proper management of the waste)  2) Does the character of the waste have  change from days of the waste have
LECESSAM.
2) Does the character of the waste handled at the facility  frequent testing?  You may cherk at
frequent today, week to handled at the facility
You may check only one
chly one
waste characteristics
All waste are basically the same
Company treasured by the same
Company treats all waste as hazardais woole oil only.
3) Is there a written waste analysis plan at the facility?
waste analysis al
Does it contain the sacrification
Does it contain the following:
G/ PAPAMA
rationale for each waste to be
rationale for the selection of these parameters.  b) Test methods used to test to
b) Test methods used to test these parameters.  c) Sampling methods as
used to test these name
c) Sampling methods to obtain a representative sample of  d) Frequency of
the waste to be obtain a remain
analyzed.
d) Frequency of remove
Current into analysis to ensure
d) Frequency of repeated analysis to ensure accurate and
4) Does have
Sources waste com
drother canonical facility a
5) If waste generator.
4) Does hazardous waste come to this facility from an outside  5) If waste comes from an outside
5) If waste comes from an outside source, are the
5) If waste comes from an outside source, are there plan to insure that waste received consequences.
accompanying manifest?
accompanying manifest?
accompanying manifest?  265.14—Security
accompanying manifest?  265.14—Security
accompanying manifest?  265.14—Security  1) Is there: a) a 24-hour surveille.
accompanying manifest?  265.14—Security  1) Is there: a) a 24-hour surveille.
265.14—Security  1) Is there: a) a 24-hour surveillance system? or,  b) a suitable barrier and outside source, are there procedures
265.14—Security  1) Is there: a) a 24-hour surveillance system? or,  b) a suitable barrier and outside source, are there procedures
265.14—Security  1) Is there: a) a 24-hour surveillance system? or,  b) a suitable barrier and outside source, are there procedures
265.14—Security  1) Is there: a) a 24-hour surveillance system? or,  b) a suitable barrier and outside source, are there procedures
accompanying manifest?  265.14—Security  1) Is there: a) a 24-hour surveillance system? or, active portion of this facility?  2) Are there "Danger-Unauthorized Personne" in the security of the security of the security of the security surrounds the security present the security of the security surrounds the security of this facility?
accompanying manifest?  265.14—Security  1) Is there: a) a 24-hour surveillance system? or, active portion of this facility?  2) Are there "Danger-Unauthorized Personne" in the security of the security of the security of the security surrounds the security present the security of the security surrounds the security of this facility?
accompanying manifest?  265.14—Security  1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the active portion of thus facility?  2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted  If no, explain what measures are
accompanying manifest?  265.14—Security  1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the active portion of thus facility?  2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted  If no, explain what measures are
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accompanying manifest?  265.14—Security  1) Is there: a) a 24-hour surveillance system? or,  b) a suitable barrier which completely surrounds the  active portion of this facility?  2) Are there "Panger-Unauthorized Personnel Keep Out" signs posted  at each entrance to the facility?  If no, explain what measures are taken for security.  Just lock down tractor's one alocated  1) Does the facility.
265.14—Security  1) Is there: a) a 24-hour surveillance system? or,  b) a suitable barrier which completely surrounds the  267.14—Security  27. Are there "Danger-Unauthorized Personnel Keep Out" signs posted  at each entrance to the facility?  If no, explain what measures are taken for security.  265.15—General Inspections Requirements  1) Does the facility have a written inspect
265.14—Security  1) Is there: a) a 24-hour surveillance system? or,  b) a suitable barrier which completely surrounds the  267.14—Security  27. Are there "Danger-Unauthorized Personnel Keep Out" signs posted  at each entrance to the facility?  If no, explain what measures are taken for security.  265.15—General Inspections Requirements  1) Does the facility have a written inspect
265.14—Security  1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the  2.) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?  If no, explain what measures are taken for security.  265.15 - General Inspections Requirements  1) Does the facility have a written inspection schedule?  2) Does the schedule identify the types.
265.14—Security  1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the  2.) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?  If no, explain what measures are taken for security.  265.15 - General Inspections Requirements  1) Does the facility have a written inspection schedule?  2) Does the schedule identify the types.
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265.14—Security  1) Is there: a) a 24-hour surveillance system? or,  b) a suitable barrier which completely surrounds the  21) Are there "Danger-Unauthorized Personnel Keep Out" signs posted  If no, explain what measures are taken for security.  255.15—General Inspections Requirements  1) Does the facility have a written inspection schedule?  2) Does the schedule identify the types of problems to be  3) Does the owner/operator record inspections in a log?  4) Is there evidence that problems reported in
265.14—Security  1) Is there: a) a 24-hour surveillance system? or, b) a suitable barrier which completely surrounds the  2.) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?  If no, explain what measures are taken for security.  265.15 - General Inspections Requirements  1) Does the facility have a written inspection schedule?  2) Does the schedule identify the types.

265.16 - Personnel Training	YES NO M/A
<ol> <li>Eave facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?</li> </ol>	_ +
If yes, have facility personnel taken part in an annual review of training?	
2) Is there written documentation of the following:	—— <del>·</del>
-job title for each position at the facility related to hazardowaste management and the name of the employee filling each jobs	15
—type and amount of training to be given to personnel in jobs related to hazardous waste management?	
-actual training or experience received by personnel?	
3) Are training records kept on all employees for at least 3 years?	
265.17-General Requirements for Idmitable, Reactive or Incompatible Mastes	
1) Are there ignitable, reactive or incompatible waste on site?	7 not sure
If yes, what are the approximate types and quantities and I'm location of the waste.	not sure if 45t. Oil is nee it was never tested.
2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?	
no apparent precentions for weak oil.	storage tonk.
<ol> <li>In your opinion, are proper precautions taken so that these wastes do not:</li> </ol>	
- generate extreme heat or pressure, fire or explosion, or violent reaction?	)
- produce uncontrolled toxic mist, funes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?	X Completed
— damage the structural integrity of the device or facility containing the waste?.	tor
- threaten human health or the environment?	-x-) 154 x 1
He real precentions taken, Oil is just	-77.07
Stored in a small horizontal tank	

1:

40 CFR 265 - Subpart C - Preparedness and Prevention	YES 30 3/A
265.32 Does the facility comply with preparedness and prevention requirements including maintaining:	<u>YES 30 37A</u>
- an internal communications or alarm system?	<u> </u>
— a telephone or other device to summon emergency assistance from local authorities?	X
- portable fire equipment?	<u> </u>
— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.	_ * _
265.33 Is equipment tested and maintained?	<u> </u>
265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?	X
265.35 Adequate aisle space?	4:
If mo, please explain storage pattern.	
In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.  Only work oil on site.	
40 CTR 265 - Subpart D - Contingency Plan and Emergency Procedure	es
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, expications or any unplant release of hazardous waste?  1) Does the plan describe arrangements made with the local	
authorities?	
2) Eas the contingency plan been submitted to the local authorities?	)
3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?	\ N/A
4) Does the plan have a list of what emergency equipment is available?	
5) Is there a provision for evacuating facility personnel?	
6) Was there an emergency coordinator present or on call at the time of the inspection?	/
40 CFR 265 Subpart E-Wanifest System, Recordkeeping and Reporting	
265.71 - Use of the Manifest	
1) Has the facility received hazardous waste from an off-site source since November 19, 1980?	X
If mo, skip to 265.73 - Operating Record mr. Urcicli	7
2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?	<u>*</u>

Groundwater, Land Treatment, Incinerators, and

Has the facility accepted hazardous waste from off-site

If yes, has the facility submitted an urmanifested waste

Thermal Treatment?

sources without a manifest?

265.76 - Urmanifested Waste Report

recort?

40 CFR 265 Subpart F - Groundwater Monitoring	<u>YES                                    </u>
(Applies only to surface impoundments, landfills and/or land to ment facilities.)	
Is a groundwater monitoring plan available at the facility?	/
If yes, please fill out the appropriate Groundwater Monitoring Questionaire and attach to this report.	
40 CFR 265 Subpart G - Closure and Post-Closure	Sun
265.111 Closure Performance Standard	\ / \
Have any portions of the facility been closed since November 19 19807	
If yes, please explain	
265.112 - Closure Plan	
Does the facility have a written closure plan? (Applies to all types of TSD facilities)	_ & _
If yes, does the written plan include:	
1. A description of how and when the facility will be partially (if applicable) and ultimately closed?	
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	
3. A description of the steps necessary to decontaminate facility equipment during closure?	
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?	MA
5. Does the owner/operator have a written estimate of of the cost of closing the facility?	
If yes, what is it? (\$)	
265.118 - Post Closure Plan	
Does the facility have a written post-closure plan? (Applies only to disposal facilities)	X
If yes, Does the Plan:	
<ol> <li>Identify the activities which will be carried on after closure and the frequency of these activities?</li> </ol>	
<ol> <li>Include a description of planned groundwater monitoring activities and their frequency during post-closure?</li> </ol>	
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?	> N/A
4. Include the name, address and phone number of a person or office to contact during post-closure?	
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?	:
If yes, what is it? (\$)	

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

Storage	Treatment	Disposal
Container - pg 6	Tank - pg 7	Landfill - pg ll
Tark, above groun	nd-pg 7 Surface Impoundment-	og 8 Land Treatment - pg 10
Tank, below groun	nd-pg 7 Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundment	ents-og 8 Thermal Treatment- og	12 Other
Waste Piles - pg	9 Land Treatment - pg 1	
Other	Chemical, Physical ar Biological Treatment	
	Cther	
		YES NO N/A
40 CFR 265 - Subp	art I - Containers	
Describ	pe of containers are used for e the size, type, quantity and 2 fifty-five gallon drums of	nature of waste
2) - Is ther precipi	, e a contairment system for spi tation?	lls, leaks and
If yes,	describe.	
265.171 - Do the danger	containers appear to be in goo of leaking?	d condition, not in
If mot. leaking	please describe the type, con or corroded containers. Be de	dition and number of etailed and specific.
265.172 - Are hazz	ardous waste stored in contain	ers made of comparible
materia	ls?	
If not,	please explain.	
265.173(a) - Are	all containers closed except t	nose in use?
OF ST	ontainers appear to be properly cored in a manner which will m ne container nipturing or leak	nimize the risk
265.174 - Is th	ne storage area inspected at l	east weekly?
ar 10	containers holding ignitable areas 50 feet (15 meters) away serty line?	nd reactive waste located from the facility's
265.177 - Are i	ncompatible wastes stored separations are separations and separations are separations and separations are separations and separations are sepa	urate from each
If no	, explain	

`<u>YES NO</u> N/A

40 CFR 265 Subpart J - Tanks

265.190 1) What are the approximate number and size of tarks
2) Identify the waste treated/stored in each tank. Gal Capacity
approx. 40-50 gals, presently stored in tank
265.192 - General Operating Requirements
Tank is used  1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?
of past, present, or risk of future leaks?  If no, please explain.
hat is when the company's trucks could easily back into tank and rapture it
rucks one Serviced. 2) Are there leaking tanks?
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corresion, leaks or other failures?
4) Do uncovered tanks have at least 2 feet of freeDoard or an adequate containment structure?
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the intlow from the tank?  e.g. bypass system to a standby tank
265.194 - Inspections
1) Is the tank(s) inspected each operating day for a) discharge control equipment b) monitoring equipment c) level of waste in tank
2) Are the tarks and surrounding areas (e.g., dike) inspected weekly for leaks, corresion or other failures?  **Virgin**
failures?  X Virgin  3) Are there underground tanks?  If yes, how many and can they be entered for inspection?
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?
If no, please explain.
265.199 - Does it appear that incompatible wastes are being stored separate from each other?

## TUNNEL BARREL & DRUM CO., INC.

DEALERS IN NEW & USED

# BARRELS AND DRUMS 85 TRIANGLE BOULEVARD

CARLSTADT, N. J. 07072

January 12, 1983

U. S. Environmental Protection Agency Washington D.C. 20460

Attention: Mr. John Skinner

11.

Acting Director, Office of Solid Waste

Dear Sir:

First of all I sincerely apologize for this report being late, but due to the busy Holiday season and beginning of new year activity and general confusion, I did not have time to submit this by January 10.

The reason for me sending this letter rather than just filling out the forms which were sent by your office is that the three companies listed

Tunnel Barrel & Drum Co., Inc. Monocrete Container and Drum Co. Gluck Barrel & Fiber Drum Co.

do not qualify as handlers, generators, storers or transporters of hazardous waste. As you can see from the information on the enclosed form #OMB:2050-0005, the only hazardous product of any kind which our three companies have come in contact with is waste oil from engines and transmissions which is accumulated in the normal servicing of our company vehicles.

I would therefore like you to remove our three companies from your list of companies which handle, generate or store hazardous wastes. Our company buys and sells used steel drums which did have hazardous waste in them but in accordance with the regulations set forth by your office, these drums are empty and not considered hazardous waste. When the regulations were first published, empty drums were considered hazardous waste and if the law was to be enforced, our company would be forced out of business. We therefore filed for the proper permits so that we did not have to close down our business. As you now know, the regulations have been changed or clarified so that an empty drum is not considered hazardous waste and we can therefore continue our operation and provide a very necessary service to the companies with which we do business.

I hope that I have shown you clearly the reason for us filing initially and why I would now like to be removed from your list of companies having hazardous waste activity. Also, after talking to Mr. Tom Piccone, U.S. EPA Region II, Permits Admin. Branch, I would like to still keep my EPA permits which would qualify me as a transporter of hazardous waste. The reason for this would be that if some time in the future the regulations would change, we would already have a permit to transport hazardous waste and our business would not suffer any interruption. If there is any other information you need or forms that have to be filled out please call and I will take care of it immediately.

Sincerely,

TUNNEL BARREL & DRUM CO., INC.

-

Joseph Binder Jr.

JB/cy

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# 1981 STATUS SHEET FOR NON-REGULATED FACILITIES

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY FACILITIES THAT DID NOT TREAT, STORE, OR DISPOSE OF HAZARDOUS WASTE IN 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 FACILITY ANNUAL REPORT If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, complete section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

AFFIX LABEL HERE

'Information in the appropriate section below. If you did not
S-I. FACILITY EPA I.D. NUMBER
1 2 13 14 15
S-II. NAME OF FACILITY
TIGINIALI BIARRELI SI DRUM CO FNG I IIIIII
30
S-III. FACILITY MAILING ADDRESS
3 8 5   T R 1 8 N G L E   B L V D
15 16 41 42 47 51
City or Town State Zip Code
S-IV. 1981 STATUS (please explain your 1981 non-regulated status here)
The only hazardous waste generated by our company was
boo gal. of engine oil and transmission oil which was removed from our company vehicles in the course of
normal maintenance The oil was sold to Bill's waste Oil
Service EPA # NJ SWAS 6629 AB

S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not treat, store of dispose of hazardous waste during 1981 and that to the best of my knowledge this facility is not subject to the RCRA Annual Reporting reguirement.

2. To 5 to h Binder Ir. Secy. Treas.

Print/Type Name Title Signature of Authorized Representative Date Signed

## 1981 STATUS SHEET FOR NON-REGULATED GENERATORS

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZ-ARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT, REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section 5-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the raturn envelope provided. If you did not receive a preprinted label, complete all sections.

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AFFIX LABEL HERE

fice by January 10, 1963 in the return envelope provided. If any of the information on the label is incorrect, draw a line intrough it said provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.	
S-I. GENERATOR'S EPA I.D. NUMBER	
1 2 13 14 15	
S-II. NAME OF FACILITY	
TIMMINIEL BARRELLI & DRUM COLFINCIIIIIIIII	69
S-III. FACILITY MAILING ADDRESS	. The
1318   51   T   R     A   N   C   L   E     B   L   V   D	
15 16 City or Town    A   City   City	
S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)	*
<ul> <li>a. NON-HANDLEK—did not handle hazardous waste in any quantity in 1981</li></ul>	
hazardous waste) on-site at any time during 1981 (40 CFR \$261.5)	
d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR \$261.2 and 40 CFR \$261.6	
e. CLOSED—installation was closed prior to 1981	
S-V. CERTIFICATION  I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RCRA Advaual Reporting requirement.	
Joseph Binder Jr. Seey-Trees Double i/12/83  Print/Type Name Title Signature of Authorized Representative Date Signed.	

# 1981 STATUS SHEET FOR NON-REGUL

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZ-ARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RGRA BUT DID NOT MANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 OF HAZARDOUS WASTE AT ANY TIME DURING 1981. AND ARE NOT REQUIRED TO COMPLETE THE 1981. GENERATOR ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate corie in section 5-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1963 in the return envelope provided. If arms of the information on the label it incorrect, draw a line any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted



Date Signed

label, complete all sections.	
S-I. GENERATOR'S EPA I.D. NUMBER –	
1 2 13 14 15	
S-II. NAME OF FACILITY	
MICINICIPATE CONTAINAR 18 DRUNG CO FINC 1111	<u>69</u>
S-III. FACILITY MAILING ADDRESS	
15 16 Street or P.O. Box	
15 16 City or Town  A C A R L S T B D T   1   1   1   1   1   1   1   1   1	
State Zip Code	
S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)  a. NON-HANDLER—did not handle hazardous waste in any quantity in 1984	)
b. SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR \$261.5)	
c. EXEMPT—all wastes generated in farming operations (40 CFR \$262.51) or exempt pursuant to 40 CFR \$261.4	
d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR \$261.2 and 40 CFR \$261.6	
e. CLOSED—installation was closed prior to 1981	
S-V. CERTIFICATION  I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during 1981 and that to the best of my provided this installation.	ī-ir?
that to the best of my knowledge this installation is not subject to the RCPA Annual Reporting requirement.	
Joseph Binder Jr Sery Trens of Konsplets 6 1/12/83	
Print/Type Name Title Signature of Authorized Representative Date Signet	

# 1981 STATUS SHEET FOR NON-REGULATED GENERATORS

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RERA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT, REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a preprinted tabel attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section 5-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided, if any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

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41 42 4

Zip Code

State

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GLUCK BARREL IN FIBRE BRUM COLLIN	
TÜRKER BURKER BERKER	6
S-III. FACILITY MAILING ADDRESS	
15/18/51 TIRINAINGILIE 18/4/01 DI 11/11/11/11	-
Street or P.O. Box 45	17
15 16 NICISITIADITI	

#### S-V. CERTIFICATION

City or Town

I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RGRA Annual Reporting requirement.

Joseph Binder Jr. Secy-Treas. Sell 1/12/8 = Print/Type Name Title Signature of Authorized Representative Date Signed:

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